

August 9, 2007

E-19J

Mr. Phil Youngberg
Regional Environmental Manager
U.S. General Services Administration (GSA)
401 W. Peachtree Street NW, Suite 2500
Atlanta, GA 30308

RE: Comments on the Final Environmental Impact Statement (FEIS) for the National Institute for Occupational Safety and Health (NIOSH) Cincinnati Laboratory Consolidation in the counties of Hamilton and Clermont, Cincinnati, Ohio, CEQ #20070329

Dear Mr. Youngberg:

The U.S. Environmental Protection Agency (U.S. EPA) has received the document listed above. Under the National Environmental Policy Act (NEPA), the Council on Environmental Quality regulations, and Section 309 of the Clean Air Act, U.S. EPA reviews and comments on major federal actions.

The FEIS preferred alternative considers six sites for consolidation and relocation of the NIOSH Cincinnati Laboratory. In our Draft Environmental Impact Statement (DEIS) comment letter, the U.S. EPA rated the preferred alternative as EC-2, Environmental Concerns-Insufficient Information. We had specific comments about air quality, alternatives, land use, sustainability, tree mitigation, wetlands and water quality. Our comments concerning alternatives, land use, tree mitigation, wetlands and water quality were adequately addressed in the FEIS. However, we do want to suggest a few items to consider in future NEPA documentation.

We understand from section 1.7.4 of the FEIS, future NEPA documentation will fully comply with NEPA requirements by addressing the issues in Table 1-2 on P. 1-15. According to Table 1-2, the potential exists for road construction, depending upon the site selected. Please include the impacts due to associated road construction in future NEPA documentation. Next, in addition to those items listed in Table 1-2, future NEPA documentation should consider *commitment* to clean diesel strategies (as outlined in our DEIS comment letter). Finally, we encourage GSA to consider adding an alternative which would be in close enough proximity to potential future mass transit projects in the Cincinnati area (reference "Comment RM-7-10" on page F-124).

In our DEIS comment letter, we commended GSA, the CDC, and NIOSH for committing to creating a Sustainable Buildings Implementation Plan (per Executive Order 13423) prior to

construction. Thanks for the thorough explanation of how GSA plans on incorporating the Sustainable Buildings Implementation Plan in Appendix E of the FEIS.

We look forward to receiving future NEPA documentation regarding this project. If you have any questions regarding U.S. EPA's comments, please contact Ms. Julia Guenther at (312) 886-3172 or email her at [guenther.julia @epa.gov](mailto:guenther.julia@epa.gov).

Sincerely,

/s/

Kenneth A. Westlake, Supervisor
NEPA Implementation
Office of Enforcement and Compliance Assurance